



Morgan Offshore Windfarm Generation Assets Case Team
Planning Inspectorate
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(Email only)

MMO Reference: DCO/2022/00003
Planning Inspectorate Reference: EN010136
Identification Number: 20048964

22 August 2024

Dear Susan Hunt,

Planning Act 2008, BP Alternative Energy Investments Ltd, Proposed Morgan Offshore Windfarm Generation Assets Order

Response to Examining Authority's Rule 6 Letter

On 30 May 2024 the MMO received notice under Section 56 of the Planning Act 2008 (the PA 2008) that the Planning Inspectorate (PINS) had accepted an application made by bp Alternative Energy Investments Ltd, (the Applicant) for determination of a development consent order (DCO) for the construction, maintenance and operation of the proposed Morgan Generation Offshore Windfarm (the DCO Application) (MMO ref: DCO/2022/00003 PINS ref: EN010136).

The DCO Application seeks authorisation for the construction, operation and maintenance of Morgan Offshore Windfarm Generation Assets (MOWF) located approximately 22 kilometres (km) from the Isle of Man Coastline and approximately 37 km from the Northwest coast of England; comprising of up to 96 wind turbine generators, all associated array area infrastructure and all associated development in an area approximately 280 square kilometres (km²).

Two Deemed Marine Licences (DML) are included in the draft DCO. One in relation to Wind Turbine Generators (WTG) and Associated Infrastructure, and one for Offshore Substation Platforms and Interconnector Cables.

As a marine licence has been deemed within the draft DCO, the MMO is the delivery body responsible for post-consent monitoring, variation, enforcement, and revocation of provisions relating to the marine environment. As such, the MMO has an interest in ensuring that provisions drafted in a deemed marine licence enable the MMO to fulfil these obligations.

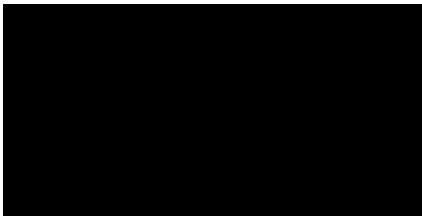


The MMO received a Rule 6 letter on 5 August 2024. Please find the MMO comments below on the following topics:

- 1. Preliminary Meeting Attendance**
- 2. Comments on Examination Timetable including Issue Specific Hearing (ISH) Attendance**
- 3. Anything further required from Examination Authority**
- 4. Responses to Relevant Representations**

This written representation is submitted without prejudice to any future representation the MMO may make about the DCO Application throughout the examination process. This representation is also submitted without prejudice to any decision the MMO may make on any associated application for consent, permission, approval or any other type of authorisation submitted to the MMO either for the works in the marine area or for any other authorisation relevant to the proposed development.

Yours sincerely



Liam Woods
Marine Licensing Case Officer

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1. Preliminary Meeting Attendance

- The MMO will not be attending the Preliminary Meeting on 10 September 2024. The MMO has reviewed the draft timetable for the examination of the application and has highlighted concerns on the timetable in section 2 for consideration by the Examining Authority (ExA).

2. Comments on Examination Timetable including Issue Specific Hearing (ISH) Attendance

- With regard to the draft examination timetable, the MMO notes that the first issue specific hearing (ISH1) is the same day as the preliminary hearing. The MMO questions the practicality of having these hearings consecutively. The MMO requests that the ExA considers rearranging these hearings to allow all participants to fully attend when there is a change in position or further discussion is required.
- Furthermore, the draft examination timetable states in point 12 that the ExA will publicise Further Written Questions (ExQ2) on Thursday 19 December 2024. A deadline of Thursday 9 January 2025 is then suggested in point 13 to provide responses to ExQ2, further comments on other submissions, and further information requested by the ExA under Rule 17. The MMO notes that both the deadlines suggested in Points 12 and 13 are around the Christmas period which could potentially cause difficulties in meeting those deadlines due to resourcing constraints. The MMO request that these deadlines are revised to allow sufficient time to review ExQ2 and provide responses to the points set out in deadline 5.
- The MMO notes that the Examination is principally a written process. The MMO understands that some issues need to be discussed in person to ensure understanding by the ExA. At this stage, the MMO is not planning on attending any ISH, however, will keep a watching brief and respond to any questions posed by the ExA on completion of the ISH. This is to ensure resource is spent on providing detailed written responses and resolving any issues with the Applicant.
- If the ExA requests MMO attendance for an ISH, the MMO would ask that hearings are organised to minimise the need for the MMO to be in attendance for all hearings, (e.g., discussing both offshore matters and onshore matters). In addition to this, the MMO would welcome any discussions on the DML or offshore DCO sections to be discussed at the earliest opportunity within the agenda. For example, in East Anglia One North and East Anglian Two, the agenda was rearranged to enable MMO involvement at the start of the hearing. This would enable better time utilisation, allowing for a more efficient and effective examination.

3. Further requests from Examination Authority

- The MMO notes that the ExA has requested Summaries of Relevant Representations that exceed 1500 words at Pre-examination Procedural Deadline. Due to resourcing issues the MMO will provide a summary of Relevant Representation at Deadline 1.

4. Responses to Relevant Representations

4.1. The MMO has reviewed the Relevant Representations (RR) submitted, specifically:

- **Corporation of Trinity House of Deptford Strond**

The MMO maintains a watching brief on the response from this Interested Party (IP).

- **Historic England**

The MMO will review the comments on the RR provided by the Applicant and provide overall comments at Deadline 1.

- **Maritime and Coastguard Agency**

The MMO maintains a watching brief on the response from this IP.

- **Natural England**

The MMO will review the comments on the RR provided by the Applicant and provide overall comments at Deadline 1.

- **National Federation of Fishermen's Organisations (National Federation of Fishermen's Organisations)**

The MMO will review the comments on the RR provided by the Applicant and provide overall comments at Deadline 1.

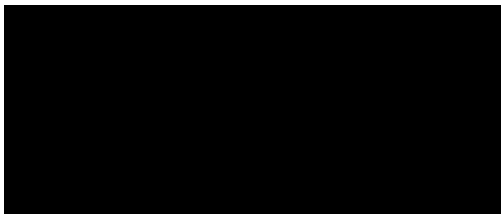
- **North West Wildlife Trusts**

The MMO will review the comments on the RR provided by the Applicant and provide overall comments at Deadline 1.

- **UK Chamber of Shipping**

The MMO maintains a watching brief on the response from this IP.

Yours sincerely



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